

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Ross William Ulbricht,	:	
	:	
Movant,	:	19 Civ. 75212 (LGS)
	:	
v.	:	[14 Cr. 68 (LGS)]
	:	
United States of America,	:	Notice of Motion in Support
	:	Of Ulbricht's Emergency Motion
	:	To Stay Order re: Attorney-Client
Respondent.	:	Privilege
	:	
	:	
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**PLEASE TAKE NOTICE**, that upon Ulbricht's Emergency Motion to Stay Order re: Attorney Client Privilege Waiver, Ross William Ulbricht will move before the Honorable Lorna G. Schofield, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, at a time and date to be set by the Court, or as soon thereafter as counsel may be heard, for the following relief:

- (a) Ordering an evidentiary hearing be held on the matters raised in Ulbricht's Emergency Motion to Stay Order;
- (b) Ordering a temporary stay of the Court's "Order re: Attorney-Client Privilege Waiver (Informed Consent)," (Order, ECF No. 380, Nov. 13, 2019);
- (c) Granting Ulbricht's request for reconsideration of the Court's privilege order;
- (d) Granting a protective order on terms as described in Ulbricht's motion to govern the use and disclosure of any privileged materials as well as parameters for any disclosures by former counsel.

Dated: November 18, 2019.

Respectfully submitted,

/s/ Zachary Lee Newland  
Zachary Lee Newland  
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*Counsel for Ross William Ulbricht*

To: Clerk of the Court

U.S. Attorney's Office  
Southern District of New York